

City of Attleboro, Massachusetts

DEPARTMENT OF WASTEWATER

Government Center, 77 Park Street Attleboro, Massachusetts 02703 Phone 774-203-1820 • Fax 508-761-9837

Paul A. Kennedy Superintendent Department of Wastewater

July, 18, 2012

Metalor Technologies 52 Gardner Street Attleboro, MA 02703

Subject: Treatment Options Status for Ammonia (TKN)

Attention: Ms. Diane George

As a result of your company's partial shutdown in July the following occurrences were observed at the City's wastewater treatment plant.

Before your company's shutdown, Attleboro's typical daily ammonia concentration entering our wastewater treatment plant ranged from the mid to high thirties (mg/l), however during Metalor's shutdown Attleboro's ammonia concentration entering the plant dropped to the low twenties, confirming our claim that Metalor's discharge is responsible for at least one third of the City's ammonia concentration that enters Attleboro's treatment plant. Once your company was in shutdown, savings at the treatment plant immediately became obvious in regard to power consumption and chemical usage. In essence, when your company is discharging to the sewer the City of Attleboro is spending more money to operate its wastewater treatment plant in order to treat your company's wastewater. In addition, there was a marked improvement with our treatment plant's ability to denitrify and comply with our NPDES limit for total nitrogen without the use of any additional carbon source chemicals. This was very encouraging and will have an enormous impact on our cost for chemicals, which should represent a substantial savings in our annual chemical budget.

In reference to your letter dated June 28, 2012, you mentioned that your company has met with four vendors to select the best treatment option to meet your company's needs. Also mentioned, one of those vendors has a rental unit that will hopefully become available in the near future.

In considering the adverse effects that your company's ammonia loading has on the City's wastewater treatment plant it would be very prudent for your company to expedite your selection process to get a treatment system in place as soon as possible, even if a rental unit is used on a temporary basis until a permanent system is installed. Within the next month Attleboro will once again be modifying its process to incorporate a very costly carbon source chemical to our process in order to meet our NPDES limit for total nitrogen. Your company's discharge will have a definite impact in regard to the amount of chemicals the City will have to use in their process along with the additional electrical costs associated.

Once the new chemical is introduced into our process your company's excessive discharge of Ammonia (TKN), will certainly have a costly impact on the way we operate our treatment plant, which will warrant the need for a substantial reduction in Metalor's discharge rate. Recent data collected at the Attleboro plant has shown Metalor's nitrite and nitrate discharge concentrations are virtually undetectable at our plant influent, however your TKN is a huge problem and your company's attention should be focused on lowering its TKN concentration. Please note that the City of Attleboro has already established a scientifically based local limit for TKN of 173 mg/l and is awaiting approval from the EPA. I must stress the fact that once the new limit goes into effect your company will be out of

compliance for that parameter and subject to enforcement. Please notify us as soon as possible to discuss your future treatment plans and a timeline for implementation.

If you have any questions, please contact me.

Sincerely,

Paul A. Kennedy Superintendent of Wastewater

cc: Mayor Kevin J. Dumas, City of Attleboro

Mr. Barry LaCasse, City of Attleboro

Ms. Lisa Nelson, District Representative

Ms. Daneen Ferreira, MA House

Mr. Jeremy Denlea, Councilman, City of Attleboro

Mr. Thomas, City of Attleboro

Mr. Aaron Dumont, City of Attleboro

Mr. John Reed, City of Attleboro

Mr. Justin Pimpare, EPA

Mr. David Burns, DEP

Mr. Andrew Costa, Metalor

Mr. Marc Marcoccio, Metalor

Mr. Nathan Pawlowski, Metalor

Mr. John Bullock, Metalor

Mr. Howard Imhof, Metalor

Mr. Benjamin Levesque, CDM Smith